

# DRAFT – DRAFT - DRAFT

## **Threshold criteria for approval of a waiver to allow a county to operate as a single county region:**

### Principles:

1. A single county region must meet all the statutory, regulatory and performance requirements as a multi-county region;
2. A single county region will have to submit a new county management plan (including manual) and have it approved in the same way as a multi-county region;
3. A single county region will have to meet all performance criteria and standards in the same manner as a multi-county region;
4. It is recognized that steps to meet management plan and performance requirements for multi-county regions are developmental, and the same would be true for single county regions;
5. Nonetheless, both single county and multi-county regions will have to meet certain “threshold” criteria before they receive approval and begin operations. These threshold criteria can also be called “readiness” criteria.

### Examples of threshold/readiness criteria:

1. Planning:
  - a. The region (County) has a complete management plan and operations manual that meet all new statutory requirements
  - b. The plan documents the input of consumers, families, providers and other stakeholders in the plan development process
2. Access
  - a. There are a sufficient number and adequate geographic distribution of designated access points to assure convenient access throughout the region (County)
  - b. Protocols for timely responses to routine, urgent and emergent requests for services are in place
  - c. There is a plan to communicate access points and related information to all actual and potential consumers, families, referral sources, and other key community stakeholders
  - d. There is a 24/7/365 telephone contact system in place
  - e. The management plan adequately addresses access issues: in rural areas; for cultural/linguistic minorities; for people with physical and other disabilities; etc.
3. Provider network sufficiency
  - a. The region (County) has contracts or memoranda of agreement with providers for each core service and any other services included in the management plan
  - b. The provider network includes at least one community mental health center that can serve the entire region (County) and/or one FQHC with outpatient mental health service capacity to serve the entire region (County)

## DRAFT – DRAFT - DRAFT

- c. The provider network includes at least one inpatient mental health facility with documented capacity and willingness to provide inpatient acute care as applicable to residents of the region (County)
  - d. The provider network includes sufficient providers to offer choice and convenience of access to services throughout the region (County) service area
  - e. The provider network includes core services providers that are trauma informed, recovery oriented (MH providers); person centered; and culturally/linguistically competent for the services populations in the region (County)
  - f. All providers in the network have the applicable licensure/certification/accreditation to qualify as providers in Iowa
  - g. Regional (County) or contracted provider capacity is identified to address pre-admission screening and hospital and jail diversion functions and capacities.
4. Targeted Case Management
- a. The region (County) has designated sufficient targeted case management capacity to meet the case management needs of enrolled consumers
  - b. The region has identified and designated targeted case management entity(ies) capable of providing conflict free case management when applicable
5. Utilization management/utilization review
- a. The region (County) has (or contracts with) sufficient skilled clinical capacity to conduct or review clinical assessments; review individual service plans; apply standard clinical protocols as defined in the management plan; and issue service authorizations/re-authorizations in a timely and clinically appropriate manner
  - b. The region (County) has in place a process and capacity to address and make timely decisions on appeals of service denials
6. Quality management
- a. The region has (or is developing?) a quality management plan with specific objectives, action steps and indicators of quality improvement
  - b. The quality management plan incorporates performance measures required by DHS.
  - c. The region has a plan and designated staff to review outcome and performance data on a regular basis and to document the ways in which outcome and performance data are used for quality improvement
7. Business management
- a. The region (County) has sufficient IT capacity to receive, adjudicate and pay provider claims and to meet all state data reporting requirements
  - b. The region (County) has a staffing plan that identifies sufficient staff expertise and functional capacity to meet all requirements for operating as a region (single County)
  - c. The total administrative costs of the region (County) do not exceed the administrative costs limitations established by DHS
  - d. For multi-county regions, there is a consolidated budget and financial management plan that accounts for all county funds and operating reserves (fund balances) in a uniform manner

## DRAFT – DRAFT - DRAFT

- e. The region (County) has a financial risk management plan and protocol to assure precise financial analysis and early warning of financial risks, and that identifies the percentage of budget to be set aside for an internal risk pool (Note: Region (Counties) with smaller population/consumer bases or lower current penetration rates are likely to need to segment higher proportions of the annual budget for a risk reserve)

### Additional considerations:

1. **Urban core:** would it be possible for a single or multi-county region to function without a populous or semi-populous urban core with numerous service providers and a variety of necessary other non-MH and ID resources (education, employment, socialization, faith community, etc.)
2. **Minimum population size:** Is there a population size below which provider choice and sufficiency risk management, and/or administrative cost ratios become inoperable?
  - a. There is no minimum population in the statute, but the Director has discretion in approving regions or single county waivers. Should there be a population size or consumer base size threshold criteria for such approval?
3. **Effect on surrounding counties:** What if an urban county wants to be a single county region, thereby excluding surrounding, contiguous counties of the benefits of the urban core and population base of the urban county?
4. Should the waiver process include waiver of certain threshold criteria if there is a credible plan to meet all criteria within a defined time period?